

1 JOHN D. PERNICK (SBN 155468)
jpernick@be-law.com
2 BERGESON, LLP
111 North Market Street, Suite 600
3 San Jose, CA 95113
Telephone: (408) 291-6200
4 Facsimile: (408) 297-6000

5 Attorneys for Defendant
6 GRAPH FOUNDATION, INC.

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION
10

11 NEO4J, INC., a Delaware corporation

12 Plaintiff,

13 vs.

14 GRAPH FOUNDATION, INC., an Ohio
15 corporation,

16 Defendant.
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Case No. 5:19-CV-06226-EJD

**STIPULATION EXTENDING TIME FOR
PLAINTIFF TO MOVE TO STRIKE AND
~~PROPOSED~~ ORDER**

1 Plaintiff Neo4J, Inc. ("Plaintiff"), by and through its attorneys of record, and Defendant
2 Graph Foundation, Inc. ("Defendant"), by and through its attorney, John D. Pernick, Esq.,
3 (Plaintiff and Defendant, collectively, the "Parties"), HEREBY STIPULATE AS FOLLOWS:

4 WHEREAS, Defendant filed its Answer to the Complaint on December 26, 2019.

5 WHEREAS, Under Rule 12(f)(2) of the Federal Rules of Civil Procedure, the deadline for
6 Plaintiff to file a Motion to Strike with respect to the Answer is January 16, 2020.

7 WHEREAS, the Parties are meeting and conferring with respect to Plaintiff's claim that
8 certain of the affirmative defenses alleged in the Answer are insufficient.

9 WHEREAS, in order to give the Parties sufficient time to meet and confer on these issues
10 to determine whether an agreement can be reached, the Parties have agreed that the deadline for
11 Plaintiff to file any Motion to Strike with respect to the Answer should be extended by 14 days.

12 IT IS HEREBY STIPULATED THAT:

13 1. The deadline for Plaintiff to file any Motion to Strike with respect to Defendant's
14 Answer shall be January 30, 2020.

15 Dated: January 8, 2020

BERGESON, LLP

17 By: /s/ John D. Pernick
18 John D. Pernick
19 Attorneys for Defendant
GRAPH FOUNDATION, INC.

20 Dated: January 8, 2020

HOPKINS & CARLEY

21 By: /s/ Jeffrey M. Ratinoff
22 John V. Picone III
23 Jeffrey M. Ratinoff
24 Attorneys for Plaintiff
NEO4J, INC.

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

26 DATED: January 8, 2020

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28 United States District Judge